

# MEMO ENDORSED



**Mavronicolas & Dee LLP**  
Attorneys at Law

2-17-15

February 17, 2015

**By ECF and Email**

The Honorable Andrew L. Carter Jr.  
United States District Court  
Southern District of New York  
40 Foley Square, Room 435  
New York, New York 10007  
ALCarterNYSDChambers@nysd.uscourts.gov

Re: The Export-Import Bank of the Republic of China v. Republique  
Du Niger, 97 Civ. 3090 (LAK)  
Request by SOPAMIN to Submit Additional Declaration

Dear Judge Carter,

We write on behalf of Interested-Third-Party SOPAMIN in connection with the Order to Show Cause (Dkt. 63) in the above-referenced matter. Just this morning we have received the Declaration of Abdoulaye Issa in response to Your Honor's inquiry during the last hearing on February 11, 2015 regarding the effect of the restraint of the Exelon payment to SOPAMIN on the mines and economy in Niger. Mr. Issa is the Managing Director of the Nigerien mining company SOMAIR, to which a substantial portion of the subject funds are to be paid by SOPAMIN.

We therefore request leave to file this short three-page declaration electronically prior to today's 2 p.m. hearing, or, alternatively, to present the Issa Declaration at the hearing.

We have provided our adversaries with the Issa Declaration this morning.

SOPAMIN's application is GRANTED.  
SOPAMIN may file the declaration, Respectfully,  
previously shown to this court, Mavronicolas & Dee LLP  
on ECF.

/s/ Peter C. Dee  
Peter C. Dee

So Ordered.  
*Andrew L. Carter* 2-17-15

**Mavronicolas & Dee LLP**  
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**CC: Via Email Attachment**

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